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February 25, 2005

Mr. Deepak Joshi
Lead Aerospace Engineer (Structure)
National Transportation Safety Board
Room 5235
490 L'Enfant Plaza, SW
Washington, DC 20594

Dear Mr. Deepak,

The following comments are in response to the Notice of proposed Rule Making published in the *Federal Register* December 27, 2004, Vol. 69, No. pg. 77150 - 77152

CJ Systems Aviation Group operates over 100 helicopters nationwide in aero-medical service and is concerned that the proposed change to 49 CFR 830.2 that would include ground damage to rotor blades within the definition of "substantial damage" will provide little or no improvement to safety while placing an unreasonable burden on operators and indirectly the public.

We are concerned that the NTSB is not adequately staffed to conduct the large number of investigations that will result from this rule change. NTSB field personnel currently investigate less than 5 % of non-injury helicopter accidents (*N.T.S.B. web site*). Including ground damage with this class will inevitably result in significant delays in effecting repairs and returning aircraft to service.

The N.T.S.B has not fully considered the financial implications of the proposed change. Out of service time, insurance rate considerations, aircraft resale value, and human resource commitments have not been analyzed. Nor has the impact to the operating budget of the F.A.A., which will inevitably be tasked with a large percentage of these investigations.

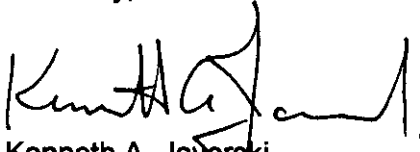
The proposal does not adequately address the nature of ground damage to rotor blades. The proposal may be read to include F.O.D. damage or damage to non-turning blades

The agency states that its only reason to include ground rotor damage within the definition of "substantial damage" is "because the main rotor blades of a helicopter are the lifting surface of the aircraft and are considered to be equivalent to the wings of an airplane, yet the N.T.S.B. does not include in its definition of "substantial", ground damage to the wing tips or flaps of airplanes.

CJ Systems Aviation supports the concept of improving the content and quality of statistical data intended to improve helicopter safety and if the purpose of the change is to this end, the N.T.S.B. has in place 49 CFR 830.5 that provides a requirement of notification without the onus of classing the event as an accident.

Finally, ground damage to rotors that result in death, serious injury or other substantial damage, such as damage to drive trains, or ground property remain reportable events and are classed as accidents under the regulation as it currently exists.

Sincerely,



Kenneth A. Javorski
Director of Operations